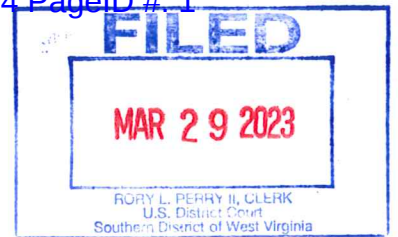


SEALED



UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF WEST VIRGINIA
HUNTINGTON GRAND JURY 2021
MARCH 28, 2023 SESSION

UNITED STATES OF AMERICA

v.

CRIMINAL NO.

3:23-cr-42
18 U.S.C. § 924(a)(1)(A)

DANIEL LEE FERGUSON

I N D I C T M E N T

The Grand Jury Charges:

COUNT ONE

1. At all relevant times, Tri-State Jewelry & Loan, LLC, d/b/a Classic Jewelry & Loan, was located in Barboursville, Cabell County, West Virginia, and was a licensed dealer of firearms as defined in 18 U.S.C. § 921(a)(11).

2. On or about February 22, 2023, at or near Barboursville, Cabell County, West Virginia, defendant DANIEL LEE FERGUSON acquired a firearm, that is, a Springfield Armory, model Hellcat, 9mm pistol, from Tri-State Jewelry & Loan, LLC, d/b/a Classic Jewelry & Loan, for a person whose identity is known to the Grand Jury.

3. On or about February 22, 2023, at or near Barboursville, Cabell County, West Virginia, and within the Southern District of West Virginia, in connection with the acquisition of the aforesaid

firearm, defendant DANIEL LEE FERGUSON did knowingly make a false statement and representation with respect to the information required by the provisions of Chapter 44, Title 18, United States Code, to be kept in the records of Tri-State Jewelry & Loan, LLC, d/b/a Classic Jewelry & Loan, that is, defendant DANIEL LEE FERGUSON stated and represented on a Department of Justice ATF Form 4473 that he was the actual transferee and buyer of the aforesaid firearm when, in fact, as defendant DANIEL LEE FERGUSON well knew, a person whose identity is known to the Grand Jury was the true actual transferee and buyer of the firearm.

In violation of Title 18, United States Code, Section 924(a)(1)(A).

COUNT TWO

1. At all relevant times, Tri-State Jewelry & Loan, LLC, d/b/a Classic Jewelry & Loan, was located in Barboursville, Cabell County, West Virginia, and was a licensed dealer of firearms as defined in 18 U.S.C. § 921(a)(11).

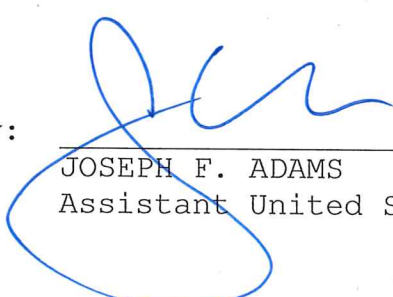
2. On or about February 25, 2023, at or near Barboursville, Cabell County, West Virginia, defendant DANIEL LEE FERGUSON acquired a firearm, that is, a Springfield Armory, model Prodigy, 9mm pistol, from Tri-State Jewelry & Loan, LLC, d/b/a Classic Jewelry & Loan, for a person whose identity is known to the Grand Jury.

3. On or about February 25, 2023, at or near Barboursville, Cabell County, West Virginia, and within the Southern District of West Virginia, in connection with the acquisition of the aforesaid firearm, defendant DANIEL LEE FERGUSON did knowingly make a false statement and representation with respect to the information required by the provisions of Chapter 44, Title 18, United States Code, to be kept in the records of Tri-State Jewelry & Loan, LLC, d/b/a Classic Jewelry & Loan, that is, defendant DANIEL LEE FERGUSON stated and represented on a Department of Justice ATF Form 4473 that he was the actual transferee and buyer of the aforesaid firearm when, in fact, as defendant DANIEL LEE FERGUSON well knew, a person whose identity is known to the Grand Jury was the true actual transferee and buyer of the firearm.

In violation of Title 18, United States Code, Section
924(a)(1)(A).

WILLIAM S. THOMPSON
United States Attorney

By:



JOSEPH F. ADAMS
Assistant United States Attorney